

FILED

AUG 5 2020

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS H. HAGLOF,

Defendant.

4:20CR384 HEA/SPM

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

(a) “minor” to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));

(b) “sexually explicit conduct” to mean actual or simulated

(i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. § 2256(2)(A)); and

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about November 10, 2019, and on or about July 31, 2020, in the Eastern District of Missouri, and elsewhere,

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the defendant herein, did knowingly receive image files and video files of child pornography using any means and facility of interstate and foreign commerce, to wit the defendant knowingly received image files and video files of child pornography via the internet, to include but not limited to the

following:

- a. an image file depicting two prepubescent male minors who appear to be under the age of twelve years with their mouths on one another's genitals;
- b. an image file depicting two prepubescent female minors who appear to be under the age of twelve years with their hands on the penis of a prepubescent male minor who appears to be under the age of twelve; and
- c. an image file depicting four prepubescent male minors who appear to be under the age of twelve with their hand on their own and one another's genitals,

in violation of 18 U.S.C. § 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about November 10, 2019, and on or about July 31, 2020, in the Eastern District of Missouri, and elsewhere,

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the defendant herein, did knowingly access with the intent to view material that contained image and video files of child pornography that were produced using material that traveled in interstate and foreign commerce, to wit the defendant possessed a Hewlett-Packard laptop, manufactured outside the state of Missouri, that contained image and video files of child pornography to include, but not limited to the following:

- a. an image file depicting two prepubescent male minors who appear to be under the age of twelve years with their mouths on one another's genitals;
- b. an image file depicting two prepubescent female minors who appear to be under the age of

twelve years with their hands on the penis of a prepubescent male minor who appears to be under the age of twelve; and

- c. an image file depicting four prepubescent male minors who appear to be under the age of twelve with their hand on their own and one another's genitals, in violation of 18 U.S.C. § 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

JILLIAN S. ANDERSON, #53918MO
Assistant United States Attorney